

RB:MMS
2010R00934

M-11-442

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT & AFFIDAVIT IN
SUPPORT OF ARREST WARRANT

- against -

JULIE GINDI,

(T. 18, U.S.C., §
1001(a)(2))

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

GEORGE VUOSO, being duly sworn, deposes and says that he is a Special Agent with the Internal Revenue Service Criminal Investigation ("IRS"), duly appointed according to law and acting as such.

Upon information and belief, on or about February 10, 2011, within the Eastern District of New York, the defendant JULIE GINDI did knowingly and willfully make materially false, fictitious and fraudulent statements and representations, in a matter within the jurisdiction of the executive branch of the Government of the United States.

(Title 18, United States Code, Section 1001(a)(2))

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this affidavit is merely to establish probable cause, I have not set forth all of the facts and circumstances of which I am aware.

1. I have been a Special Agent with the IRS for approximately five years. I have participated in numerous investigations involving financial fraud.

2. The IRS and the Department of Homeland of Security ("DHS") have been conducting a joint investigation involving various individuals located in Brooklyn, New York and New Jersey who participated in schemes to fraudulently obtain property, mortgages, bank loans and credit cards, among other things. The investigation has uncovered that in June 2010, the defendant JULIE GINDI's husband, Isaac Gindi, submitted a fraudulent lease application to an automobile broker in Brooklyn, New York in an effort to obtain a Toyota Highlander in another person's name. Records obtained by the government demonstrate that following the approval of the lease application, Isaac Gindi took possession of the car. On June 23, 2010, law enforcement agents from IRS and DHS interviewed a co-conspirator of Isaac Gindi who admitted to submitting false loan and credit card applications in another person's name with him. On June 24, 2010, the following day, the Highlander was returned to the automobile broker.

3. Agents subsequently discovered that on or about June 30, 2010, the defendant JULIE GINDI signed a lease agreement for a Toyota Highlander and submitted a credit application ("the Application") to Toyota Motor Credit Corporation. The Application stated that she had been employed by a company called

XTA TIC LLC, located at 1001 Avenue of Americas, New York, New York 10018 for three and one-half years. The Application also stated that she made \$90,000 per year while working there.

4. On February 10, 2011, I along with a Special Agent from DHS, visited JULIE GINDI at her home in Brooklyn. After identifying ourselves, I informed GINDI that we had some questions to ask her about an automobile transaction and that it related to a criminal investigation. I informed her that she could stop talking to us at any time and refuse to answer our questions. I then produced a copy of the Application and asked GINDI to review it and tell me whether the information on the Application was true and accurate. GINDI reviewed the Toyota Application and stated that the information contained in the Application was true and correct.

5. I then asked her specifically about the statements in the Application that indicated she made \$90,000 per year and worked for a company called XTA TIC LLC located at 1001 Avenue of the Americas New York, New York 10018. I told her that lying to a federal agent is a felony.

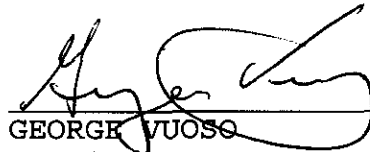
6. GINDI confirmed that she had worked for XTA TIC LLC and that her last date of employment was in September 2010. GINDI stated that XTA TIC LLC produced perfumes and her job responsibilities at the company included smelling products and putting labels on bottles. GINDI said that she did not have a

boss and did not know the name of anyone at XTA TIC LLC.

Further, she stated that someone named John or Sam called her and asked her to work for XTA TIC LLC.


7. During the time period in question, no company named XTA TIC LLC or XTATIC LLC was located at 1001 Avenue of the Americas New York, New York. I also spoke to an individual at Gina Hosierey, the entity that owns XTATIC LLC, who informed me that XTATIC LLC is a dormant company that never had any employees. In addition, the government subpoenaed tax returns from the defendant JULIE GINDI's tax preparer which indicate that the defendant reported having no income in 2008 and 2009.

WHEREFORE, your deponent respectfully requests that the defendant JULIE GINDI be dealt with according to law.



GEORGE VUOSO
Special Agent
Internal Revenue Service
Criminal Investigation

Sworn to before me this
27 day of April, 2011



THE HONORABLE
UNITED STATES
EASTERN DISTRICT OF
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